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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO,
 JULIAN SANTIAGO, and SUSAN LYNN
 HARVEY, individually and on behalf of all other
 similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-4688-RS

**MAO DECLARATION IN SUPPORT
 OF PLAINTIFFS' OPPOSITION TO
 GOOGLE'S MOTION *IN LIMINE* 14**

Judge: Hon. Richard Seeborg

Trial Date: August 18, 2025

DECLARATION OF MARK C. MAO

I, Mark C. Mao, declare as follows:

1. I am a partner with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Declaration in support of Plaintiffs' Opposition to Google's fourteenth motion *in limine*.

3. Attached hereto as **Exhibit A** is a true and correct copy of the article titled "*Google Confirms it Has Been Hacked—What User Data Has Been Stolen?*", first published by Forbes on August 7, 2025, and subsequently updated.

4. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the deposition of Dr. Jonathan Hochman taken on June 26, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 14th day of August 2025, at San Francisco, California.

/s/ Mark C. Mao